

# **EXHIBIT H**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS**

STUDENTS FOR FAIR ADMISSIONS, )  
INC., )

*Plaintiff,* )

v. )

Case No. 1:20-cv-763

UNIVERSITY OF TEXAS AT AUSTIN; )  
JAMES B. MILLIKEN, Chancellor of the )  
University of Texas System in his )  
Official Capacity; STEVEN LESLIE, )  
Executive Vice Chancellor for Academic )  
Affairs of the University of Texas System )  
in his Official Capacity; DANIEL H. )  
SHARPHORN, Vice Chancellor and )  
General Counsel of the University of Texas )  
System in his Official Capacity; )  
JAY HARTZELL, Interim President of the )  
University of Texas at Austin in his )  
Official Capacity; BOARD OF REGENTS )  
OF THE TEXAS STATE UNIVERSITY )  
SYSTEM; DAVID J. BECK, CHRISTINA )  
MELTON CRAIN, KEVIN P. ELTIFE, R. )  
STEVEN HICKS, JODIE LEE JILES, )  
JANIECE LONGORIA, NOLAN PEREZ, )  
KELCY L. WARREN, AND JAMES C. )  
“RAD” WEAVER, as Members of the Board )  
of Regents in Their Official Capacities; )  
DANIEL JAFFE, Interim Executive Vice )  
President and Provost; RACHELLE )  
HERNANDEZ, Senior Vice Provost for )  
Enrollment Management and Student )  
Success; and MIGUEL WASIELEWSKI, )  
Executive Director for Office of Admissions,) )

*Defendants.* )

**Declaration of  
Alexandra Trujillo**

I, Alexandra Trujillo, pursuant to 28 U.S.C. § 1746, declare the following:

1. The facts set forth in this declaration are based on my personal first-hand knowledge, and

if called as a witness, I could and would competently testify to the following matters under oath.

2. I identify as a Venezuelan-American and Latinx woman. I was born and raised in the United States, but visited Venezuela frequently throughout my life and have maintained a strong connection to my heritage. For this reason, I consider myself bi-cultural.
3. I am currently a senior at the University of Texas at Austin (“UT”), class of 2021. I am majoring in Advertising, with minors in African and African Diaspora Studies and Business.
4. My racial identity has impacted my experiences from primary school through college. In grade school, I was often ridiculed or “otherized” by white students. For example, during roll call, my hyphenated Latinx last name—which is longer than most white American names—would cause an uproar among my classmates, causing me to feel like the unwelcome “other.” I often hid my racial identity to avoid being excluded from my peers. I also struggled to find bi-cultural experiences that represented and affirmed my identity in my school environment or popular media. This lack of representation and inclusion only deepened my connection to Venezuela.
5. While these experiences of feeling like an outsider were challenging, they also made me a much more empathetic person and independent thinker. These experiences instilled in me a deep commitment to work towards creating a society where everyone feels welcome, seen, and valued. I believe this type of inclusive culture allows everyone to reach their highest potential, and improves society overall.
6. In high school, I performed well academically and participated in many extracurricular activities. I attended Ridge Point High School in Missouri City, Texas, which had a racially diverse student body during my time there (35% white, 24% African American,

25.5% Latinx, 11.8% Asian American, 3% mixed race). My goal throughout high school was to attend UT, so I enrolled in nine AP courses, scoring at least a three or above on the four AP exams that I took. I focused on being the most competitive candidate that I could be and I graduated with an approximate GPA of 3.66. I was part of the National Honors Society, the Spanish National Honor Society, Key Club, and the Peer Assistance Leadership Students (PALS) mentorship program, where high school seniors mentor elementary school students and differently abled individuals. I also earned the Girl Scout Gold Award—the most prestigious award that can be earned by a Girl Scout Senior or Ambassador. I was fortunate that my family could afford to pay for SAT test-prep courses. I know that my SAT superscore score of approximately 1780 out of 2400 benefitted from those prep courses. Many lower-income families of color cannot afford those courses. I was admitted to UT through the holistic review process.

7. UT's consideration of race in admissions was incredibly important to me as a bi-cultural woman. I wrote one of my application essays on my Venezuelan identity and its impact on my childhood, growth and development, and how I see the world(a copy of which is attached to this declaration). As I explained in my essay: "My Venezuelan culture has really helped shape me into the person I am. From being exposed to my Venezuelan, New Mexican, and American cultures, I have learned about the importance of identity." This intersectional viewpoint has helped me understand different perspectives and find commonalities across diverse experiences.
8. I have participated in a wide-range of extracurricular activities at UT, including: Texas Sweethearts, MenCanEnd (aims to promote healthy masculinity), Texas Real Beauty (a two-week campaign on one becoming the most authentic version of oneself), the Stan Richard School's Equity Council, and the student-run radio station KVRX.
9. Diversity at UT has given me the ability to interact with people from different

backgrounds, and better understand the experiences of different multicultural communities. For example, in my Black Studies class, we discussed the Black Lives Matter movement and the Latinx support behind it. Many people don't understand the intersectionality that exists with being Black and Latinx. My family is of Afro-Latinx descent so I am aware of some of the difficulties surrounding being Black in Latin America. However, once here in the United States my bi-racial family members were only considered Latinx immigrants in the eyes of many, not seen for their bi-racial identity. I have shared these experiences in class and with friends to highlight the complexity of identity.

10. At UT I have learned about the intersectionality of being Black and Latinx and the unique experience that comes from it. These lessons are largely due to the ethnic and racial diversity that exists within UT's Latinx community. For example, I learned about how the phrase "Latinx for Black Lives" invalidates those who are Afro-Latinx by creating the false idea that they are two separate communities, thereby undermining the unity needed to more effectively fight for equality. Without robust discussions about race, collaboration between affinity groups, and a diverse multicultural community, these lessons and insights would not be possible.
11. My studies as an African and African Diaspora Studies minor have expanded my worldview and perspectives in ways that I could never have imagined. My learning experiences have been rooted in the racial identities of my classmates and how those identities shape how they are treated in the wider world. Class discussions with my peers of color helped me respond thoughtfully to critical questions about the role of race in society. For example, I was able to respond to an essay prompt about George Floyd's murder in my Black Studies course in a manner that I could not have in the past without

the insights I have garnered throughout my conversations with students of multicultural backgrounds.

12. I have felt more comfortable and welcome at UT knowing that there are organizations that support students of color on campus and strive for racial equity. For example, I am part of the Stan Richards School's Equity Student Council which is a collective comprised of a higher proportion of students of color. I feel much more comfortable speaking about my own experiences with this group, and supported when I may be dealing with an issue of racial bias on campus. Not only do I feel listened to, but I feel heard and encouraged that real change is possible on campus. Members of the council, including the Professors, all have very different experiences however, the common experience of being an underrepresented identity here at UT brings us together. It is a safe space for us to discuss things we have noticed inside and outside the classroom that could be improved to make other students like us feel safer. I remember the first meeting I attended we all shared our background and why we wanted to join the Equity Council. Sharing my story at that meeting was one of the first times that I felt truly heard and validated.
13. I am often one of the only Latinx woman in the classroom (both at UT and in my AP classes in high school). While I am confident and like to use my voice to stand up for what I believe in, there is always the pressure of "representing my identity group" and if I mess up, it might reflect poorly on my community. Often, as the only person of color in a space, I feel like an outsider on my college campus, or even in my own country. At times I feel like I'm being watched, with the stereotypes of Latinx-American woman being feisty and hypersexualized from a young age directed toward me. My senses are always a little heightened due to these biases and discriminatory attitudes. Having other students from multiethnic, multicultural backgrounds to build community with has made me feel

more comfortable and welcome. Without them, I would have had the perpetual feeling of being an outsider, which may have affected my academic performance, and hindered my leadership growth and development.

14. While UT's efforts to diversify the student body have led to many positive changes for students, our community has a long way to go before it is truly inclusive and welcoming. I have witnessed both overt and subtle forms of racial prejudice from students and professors. For example, I have witnessed a professor suggesting that all Latinx students should minor in Mexican-American studies. This statement disregarded the ethnicities of Latinx students, their academic interests, and the complexities of their identities. I also observed a non-Native Spanish speaking professor begin speaking Spanish to a student who appeared to be Latinx, without any previous knowledge of the student's race, identity, or language capability. When these and other incidents occur, I feel surprised that even professors are making these mistakes, and I become aware of just how much work is left to be done. If there was a more racially diverse community of professors and students, I believe that incidents like this would decrease because in my experience greater racial diversity results in fewer displays of racial prejudice and more opportunities to correct racially-biased behaviors. Having a truly diverse campus community would show that the university is committed to making the changes that it claims its students are preparing to enact in the world through its motto: "What Starts Here Changes the World."
15. UT must also address its legacy of racial discrimination in its symbols and traditions. For example, singing the "Eyes of Texas"—which was first sung in blackface at minstrel shows many decades ago—at school events such as football games is harmful to many students in the community, particularly Black students on campus. It sends a message to

Black students, and other students of color, that the school continues to disrespect the experiences of non-white students and communities. This makes me, and others, feel even more alienated on campus and less comfortable fully engaging in classes and campus activities.

16. If the number of underrepresented minority students decreased on campus, students of color would feel a loss of community, belonging, and motivation, which could negatively affect academic performance and leadership. I know that having fewer Black and Latinx students on campus would make me feel even more like an outsider in my classes.

Throughout my time at UT, I have felt empowered by my identity because of the community I have been able to build with other students of color. For example, last October, I was recommended by a professor to attend the Multicultural Talent Pipeline conference hosted by Publicis Media in Atlanta, GA. I attended alongside seven other students who were also students of color. At this conference we had a racially diverse group of speakers from different advertising agencies speak to us about their experiences and the importance of finding your voice and supporting each other in the workplace. I became very close with the group of students that I traveled with and I know that we will support each other throughout our careers after graduation. If the admit rate for Black and Latinx students decreased, I likely would not have the same level of networking and mentorship support from others who share my identity and have had similar experiences. This reality is true for many students of color—we often turn to each other in class settings, engagement centers, and in student organizations to offer academic, professional, mentorship, and socio-emotional support.

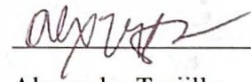
17. Racial diversity matters and class and race are not interchangeable. One can be Black and from a higher income family or white from a lower-income family. However, there are



structural barriers that sometimes prevent some racial groups across income levels from attaining the same level of wealth as their white counterparts.

18. By considering race and listening to my story, UT was able to get a better idea of who I am and who I want to become. My identity as a Venezuelan-American woman is a foundational aspect of my life which has shaped me into the person I am today. I have a different worldview lens from those of other cultures and communities, and it is important to recognize that reality alongside the reality that there isn't a "one size fits all" for Latinx people. If UT were to stop considering race in the admissions process, it would not be able to listen to my full story or understand why I have become the person I am today.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County in the State of Texas on November 3, 2020.

  
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Alexandra Trujillo

Attachment (Declaration of Alexandra Trujillo)

Alexandra Trujillo

### Topic C

Growing up in a suburban neighborhood outside of Houston is obviously a blessing. I grew up surrounded by the best schools, caring and safe families, and with beneficial opportunities around every corner. If I did everything correctly, my future was guaranteed. I had it all laid out in front of me. Except, everyday I live with the guilt of my ideal American life.

My mom's entire side of the family cannot grasp the concept of the future. They have been forced to live in the now. While I'm questioning whether I'll be accepted into the school of my dreams, my seventeen year-old cousin is questioning whether she'll have milk for her cereal in the morning. In order to help them survive, my family sends them care packages with items that we would never consider a luxury, such as shampoo, toothpaste, and cereal. I haven't visited Venezuela in over seven years and I haven't seen half of my family in over seven years. I daydream about visiting my family again everyday. If I could go anywhere in the world, it would be Caracas, Venezuela.

The situation in Venezuela has been presented all over the world on major news networks. The riots, police brutality, and the injustice. While I've been allowed to enjoy being a kid, my cousins that are the same ages as me, had to grow up much quicker. That isn't fair to them or any kids their age. I've had to witness this my entire life, but from another continent. I wish I had the comfort of knowing my family was living in a safe environment, but instead, I always have to be prepared for the worst news. With my plane ticket, I would go back to Venezuela and not only revisit with my family, but I want to make the most out of the time I have with them while I have them. I'm not saying death is a guarantee in Venezuela, but the risk is obviously higher there than in Houston, Texas. Watching my family struggle, to this day, hurts

my heart in unexplainable ways and I just want to spend more time with them and be able to do something about their fear, but that's something I have no control over.

Visiting Venezuela not only means that I could connect with my family again but it means that I could experience my culture first hand again. My Venezuelan culture has really helped shape me into the person I am. From being exposed to my Venezuelan, New Mexican, and American cultures, I have learned about the importance of identity. Being able to connect to my roots once again brings me a feeling of comfort and hope. There's no other feeling than truly feeling at home with your family and with my ticket, that's exactly what I would hope to experience again.

Having a plane ticket to Venezuela would mean two things: reuniting with my family, and reconnecting with my culture. Most of my friends don't need to worry about either of those. All of their life is centered in the United States, except for me, half of my life is centered around Venezuela.